

Opinion of the Korean electronics industry on Draft 1 Version 8.0 ENERGY STAR TV specification

KEA, the association representing the Korean electronics industry, wishes to express its sincere appreciation for the efforts of the EPA to manage energy efficiency of electrical and electronic products. The Korean electronics industry strongly supports the US Government's policy for environmental protection and the operation of relevant systems, and Korean manufacturers are making every effort to comply faithfully with any specific requirements. In this regard, KEA has noted from a recent webinar¹ that the EPA aims to finalize its draft of Version 8.0 of the ENERGY STAR product specification for televisions ["the specification"] in May 2017 and have the updated specification take effect in March 2018. To facilitate this revision, KEA would like to submit the below comments on behalf of the Korean electronics industry and respectfully asks that they be reflected in the final draft of the specification.

First, KEA requests that the EPA include a clear definition of the "more energy consuming Special Functions", which are addressed in paragraph 3.2.7 of the specification. At present, section 1.D of the specification mentions Automatic Brightness Control(ABC), motion recognition and voice recognition as examples of Special Functions, but the document does not clearly specify which Special Functions are to be considered "more energy consuming" for the purpose of paragraph 3.2.7. KEA hereby believes that a requirement to alert users of each function that is expected to cause a rise in energy consumption (for example, to display a warning notice every time the volume of a television is adjusted) without imposing any limitations in terms of scope will likely lead to an increase in consumer inconvenience. In particular, there may be a difference between what a manufacturer defines as a Special Function and what the EPA and all other interested parties define as a Special Function.

¹See slides of webinar of March 20, 2017 at:

<https://www.energystar.gov/sites/default/files/Televisions%20Version%208.0%20Draft%201%20Specification%20Webinar%203.21.17.pdf>.

Second, KEA requests that the EPA define the luminance requirements for televisions that are set out in section 3.6 of the specification on the basis of a relative standard. KEA hereby agrees with the objective of preventing the distortion of results of electric power consumption measurement, but submits that the standard that is currently proposed in paragraphs 3.6.3 and 3.6.4 of the specification is excessively stringent for the Korean electronics industry to meet. As there are several factors that may cause significant deviation in luminance test results, such as panel sheet or light guide plate in display modules, defining luminance with absolute values will oblige manufacturers to verify all units in a mass production process. KEA therefore suggests that because luminance requirements depend on the performance of the module, luminance should instead be defined as a specific ratio against luminance in the brightest mode. An example of such a definition on the basis of a relative standard would be “screen luminance under environment of 3lux of surroundings should be over XX% of luminance in the brightest mode”.

Third, KEA requests that the EPA include a clear definition of the conditions for actual use in order to ensure a transparent and consistent evaluation of energy saving features in paragraphs 3.2.3. Such a definition is necessary because energy saving features vary with factors such as, for example, static/dynamic characteristics of contents, and there may accordingly be differences between the results of a test that the manufacturer conducts for various kinds of clip to prove energy saving features and the interested parties’ test clip of conditions for actual use. KEA hereby believes that such differences in test results may in turn lead to a negative attitude of consumers towards the product and of manufacturers towards equipping energy saving features, thereby hampering innovation.

In sum, KEA would like to reiterate its request that the EPA take these comments of the Korean electronics industry into account in its ongoing revision of the specification and include them in the final draft that it aims to present in May 2017.

Thank you.